

# EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BLOCKCHAIN MINING SUPPLY AND  
SERVICES LTD.,

Civil Action No. 1:18-cv-11099-ALC

*Plaintiff,*

–against–

SUPER CRYPTO MINING, INC. n/k/a  
DIGITAL FARMS, INC. and DPW  
HOLDINGS, INC.,

*Defendants.*

**PLAINTIFF'S SECOND SET OF REQUESTS FOR PRODUCTION TO DEFENDANTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Court's order of December 4, 2020, plaintiff Blockchain Mining Supply and Services Ltd. ("Plaintiff") hereby requests that defendants Super Crypto Mining, Inc. n/k/a Digital Farms, Inc. ("Super Crypto") and DPW Holdings, Inc. ("DPW" and, together with Super Crypto, "Defendants" and each a "Defendant") respond to these requests for production of documents and things (the "Requests" and each a "Request") by producing the following documents and things for inspection and copying at the offices of Cowan, Liebowitz & Latman, P.C., 114 West 47th Street, New York, New York 10036, within thirty (30) days after service hereof.

**DEFINITIONS AND INSTRUCTIONS**

Plaintiff hereby incorporates by reference the Definitions and Instructions in Plaintiff's First Set of Requests for Production to Defendants.

The timeframe applicable to all the following Requests is January 1, 2018 to December 31, 2018.

**REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS**

**Request No. 16**

Documents sufficient to show the amount, date, originating account and named payor for each and every payment made by or on behalf of DPW that originated in New York and relate, in whole or in part, to Plaintiff or obligations to Plaintiff, including the Agreement.

**Request No. 17**

All communications sent from New York by or on behalf of DPW or Ault that relate, in whole or in part, to Plaintiff or obligations to Plaintiff, including the Agreement.

**Request No. 18**

All documents and communications in the possession, custody or control of DPW that relate, in whole or in part, to Plaintiff or obligations to Plaintiff, including the Agreement.

**Request No. 19**

All communications between Super Crypto, on one hand, and DPW or Ault, on the other hand, concerning the Agreement, including the 1,100 Bitmain Antminer S9 model cryptocurrency mining machines and 1,100 power supply units that Plaintiff agreed to sell, and Super Crypto agreed to buy, pursuant to the Agreement.

**Request No. 20**

All communications between Super Crypto and DPW concerning each and every payment to Plaintiff.

Date: December 9, 2020

Respectfully submitted,

By: 

Ronald W. Meister (rwm@cll.com)

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Cowan, Liebowitz & Latman, P.C.

114 West 47th Street

New York, New York 10036

Tel: (212) 790-9200

Fax: (212) 575-0671

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on December 9, 2020 I caused a true and correct copy of the foregoing **Plaintiff's Second Set of Requests for Production to Defendants** to be served on Defendants by transmitting a copy of the same via email to Defendants' counsel, Robert B. Volynsky, Esq., at rvolynsky@weltz.law.



Dasha Chestukhin